

April 11, 2025

Kevin Kyle, District Ranger
James River/Warm Springs Ranger District
422 Forestry Rd.
Hot Springs, VA 24445

Dear Mr. Kyle,

It is a privilege for me to be able to comment on the Big Piney Project on behalf of Smurfit Westrock Forest Resources at the Smurfit Westrock Covington Mill. We are in support of and recognize the need to address the gap between current conditions on the ground and the desired conditions in the GW management plan. I recently spent some time hiking through several of the stands within the proposed treatment area and as a local resident and forest user I am pleased that this project will be taking place knowing that it will greatly improve the wildlife habitat within the region. As a forester I strongly support the plan to transition much of the late successional stage timber stands to early successional habitat. Much of the GW/Jefferson National Forest within the region are comprised of stands of over-mature timber that need to be harvested. The proposed creation of 830 acres of early successional habitat will greatly improve the biodiversity of the area while also improving recreational opportunities for area outdoors enthusiasts who enjoy pursuing wildlife that are dependent on a mix of stand diversity. The 1,771 acres of thinning treatments will also improve the stand diversity and improve the health of the stands though I would encourage more creation of early successional habitat these thinning areas will also greatly benefit health of the stands as opposed to their current stage.

As a prominent purchaser of forest products within the region we support the proposed thinning and regeneration treatments in this area of Bath County. We provide a market for pulpwood from multiple logging operations within the region who may be interested in purchasing sale packages, many of whom regularly work on the GW/Jefferson National Forest and are well adapted to working on the terrain and familiar with the requirements of cutting timber on the Forest Service. These loggers are very capable of working on scaled sales which would greatly reduce the amount of manpower needed by your timber administration team to lay out and administer these timber sales. Many of the local consuming mills have the capability of processing sales in this way, most private timber sales within this region are administered as scaled sales.

We also support the proposed prescribed burn block and recognize that fire is crucial on the landscape to improve wildlife habitat and reduce the fuel load to lessen the risk of catastrophic wildfires. While we recognize the importance of these prescribed burns it is important to point out that Smurfit Westrock's Covington Mill cannot purchase charred wood. We make bleached white paperboard and the charred fibers do not bleach out leaving black specs on the paper, this causes defects that cannot be passed on to our

customers. Please keep that in mind as you are laying out timber sales and please do not include any areas that have had prescribed burns or wildfire in recent years.

Thank you for the opportunity to comment and for the work that you and your team are doing to close the gap between the current conditions and the desired conditions of our George Washing and Jefferson National Forest.

Sincerely,

Justin Shanks

Procurement Forester

Smurfit Westrock

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